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10	Lead Counselfor Launings	
10		
11	IN THE UNITED STATES	DISTRICT COURT
12	FOR THE DISTRICT	OF ARIZONA
13		
14		NO. 4:23-cv-00233-TUC-CKJ
15	State of Arizona, ex rel. Kristin K. Mayes,	
2232340	Attorney General; et al.,	NOTICE OF SERVICE OF
16	Plaintiffs,	PLAINTIFFS' FED. R. CIV.
17	Traintinis,	P. 5(d)(1)(A) DISCOVERY
1.0	v.	REQUESTS AND RESPONSES
18	Mishael D. Landar I. I. C. Alsa Asid	SERVED BETWEEN
19	Michael D. Lansky, L.L.C., dba Avid Telecom; et al.,	FEBRUARY 7, 2025, AND
20	Telecom, et al.,	AUGUST 19, 2025
20	Defendants.	
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22		I
23	Pursuant to LRCiv 5.2, Plaintiffs respe	ctfully submit the following notice and
24	chronology of all discovery requests and respons	
25		
	Civ. P. 5(d)(1)(A) and served on Defendants as	
26	after the Protective Order and ESI Protocol were	e entered by the Court:
27		
28	¹ The Protective Order (Doc. 109) was entered of Governing Electronically Stored Information and (Doc. 120) was entered on July 10, 2025.	

Michael D. Lansky, and Stacey S. Reeves on December 31, 2024;

On February 7, 2025, Plaintiffs served (by email) Plaintiff States' Responses and

Objections to Defendants' First Request For Production of Documents served

by Defendants Michael D. Lansky LLC, dba Avid Telecom ("Avid Telecom"),

On February 7, 2025, Plaintiffs served (by email) Plaintiff States' Objections

and Answers to Defendants' First Request For Admissions served by

On February 7, 2025, Plaintiffs served (by email) Volume AGTF VOL001

AGTF 000000980) to Defendants' First Request For Production of Documents;

On February 21, 2025, Plaintiffs served (by email) Plaintiffs' First Rule 34

On March 6, 2025, Plaintiffs served (by email) Plaintiffs' First Rule 34 Requests

Requests For Production to Michael D. Lansky, L.L.C., dba Avid Telecom;

Document Production (Bates Nos. between AGTF 000000001

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- For Production to Michael D. Lansky;
 On March 6, 2025, Plaintiffs served (by email) Plaintiffs' First Rule 34 Requests
 For Production to Stacey S. Reeves;
 On April 16, 2025, Plaintiffs served Defendants (by email) with Plaintiffs'
 Notices of Issuance of Rule 45 Subpoenas, which subpoenas were issued to each
 of the following:
 - o American Express;
 - o Bank of America, N.A.;

Defendants² on December 31, 2024;

² Plaintiffs note that this set of Requests for Admission served by Defendants contained numerous errors. For example, the requests: (1) were said to be issued by "Defendant, Dollar Phone Access, Inc." rather than Defendants Michael D. Lansky LLC, dba Avid Telecom, Michael D. Lansky, and/or Stacey S. Reeves; (2) were dated December 12, 2024, but served on December 31, 2024; and (3) included a certificate of service that was said to have issued the foregoing "Second Request for Production of Documents" on December 8, 2015, rather than a First Request for Admissions issued on December 31, 2024. The definitions in this set of Requests for Admission also improperly define "You" as "Southwestern Bell," rather than the Plaintiffs in the present case.

- 1	
1	o Bill.com;
2	o BMO Bank, N.A., f/k/a Bank of the West;
3	o JP Morgan Chase Bank, N.A.;
4	o PayPal, Inc./Venmo;
5	o Wise US, Inc.;
6	o Wells Fargo Bank, N.A.;
7	o Stripe Payments Company;
8	o Achieva Credit Union;
9	o PNC Bank, N.A.;
10	o Space Coast Credit Union;
11	o USAA Federal Savings Bank;
12	o Alliant Credit Union;
13	o Citibank NA;
14	o Hughes Federal Credit Union;
15	o Tucson Federal Credit Union;
16	o U.S. Bank NA; and
17	o Vantage West Credit Union;
18	 On May 23, 2025, Plaintiff State of Arizona, ex rel. Kristin K. Mayes, Attorney
19	General served (by email) its Response to Defendants Michael D. Lansky
20	LLC's, dba Avid Telecom, Michael D. Lansky's and Stacey Reeves's Notice of
21	Rule 30(B)(6) Deposition, which notice was served by Defendants on April 22
22	2025;
23	 On May 23, 2025, Plaintiff Office of the Maryland Attorney General served (by
24	email) its Response to Defendants Michael D. Lansky, LLC's, dba Avid
25	Telecom, Michael D. Lansky's and Stacey Reeves's Notice of Rule 30(B)(6)
26	Deposition, which notice was served by Defendants on April 22, 2025;
27	On May 23, 2025, Plaintiff State of North Dakota, ex rel. Drew H. Wrigley
28	Attorney General served (by email) its Response to Defendants Michael D

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- Lansky, LLC's, dba Avid Telecom, Michael D. Lansky's and Stacey Reeves's Notice of Rule 30(B)(6) Deposition, which notice was served by Defendants on April 22, 2025;
- On May 23, 2025, Plaintiff State of Wisconsin served (by email) its Response to Defendants Michael D. Lansky, LLC's, dba Avid Telecom, Michael D. Lansky's and Stacey Reeves's Notice of Rule 30(B)(6) Deposition, which notice was served by Defendants on April 22, 2025;
- On May 27,2025, Plaintiff the People of the State of California served (by email) its Response to Defendants Michael D. Lansky, LLC's, dba Avid Telecom, Michael D. Lansky's and Stacey Reeves's Notice of Rule 30(B)(6) Deposition, which notice was served by Defendants on April 22, 2025;
- On May 27, 2025, Plaintiff the People of the State of New York by Letitia James, the Attorney General of the State of New York served (by email) its Response to Defendants Michael D. Lansky, LLC's, dba Avid Telecom, Michael D. Lansky's and Stacey Reeves's Notice of Rule 30(B)(6) Deposition, which notice was served by Defendants on April 22, 2025;
- On May 27, 2025, Plaintiff State of Ohio served (by email) its Response to Defendants Michael D. Lansky, LLC's, dba Avid Telecom, Michael D. Lansky's and Stacey Reeves's Notice of Rule 30(B)(6) Deposition, which notice was served by Defendants on April 22, 2025;
- On May 28, 2025, Plaintiff State of North Carolina, ex rel. Jeff Jackson, Attorney General served (by email) its Response to Defendants Michael D. Lansky, LLC's, dba Avid Telecom, Michael D. Lansky's and Stacey Reeves's Notice of Rule 30(B)(6) Deposition, which notice was served by Defendants on April 22, 2025;
- On May 29, 2025, Plaintiff State of Florida served (by email) its Response to Defendants Michael D. Lansky, LLC's, dba Avid Telecom, Michael D. Lansky's

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³ Plaintiffs' document production resumed on July 22, 2025, after entry of the Protective Order and ESI Protocol.

- and Stacey Reeves's Notice of Rule 30(B)(6) Deposition, which notice was served by Defendants on April 22, 2025;
- On May 29, 2025, Plaintiff State of Indiana, ex rel. Todd Rokita, Attorney
 General served (by email) its Response to Defendants Michael D. Lansky,
 LLC's, dba Avid Telecom, Michael D. Lansky's and Stacey Reeves's Notice of
 Rule 30(B)(6) Deposition, which notice was served by Defendants on April 22,
 2025;
- On June 2, 2025, Plaintiff State of Rhode Island, ex rel. Attorney General Peter
 F. Neronha served (by email) its Response to Defendants Michael D. Lansky,
 LLC's, dba Avid Telecom, Michael D. Lansky's and Stacey Reeves's Notice of
 Rule 30(B)(6) Deposition, which notice was served by Defendants on April 22,
 2025;
- On June 4, 2025, Plaintiff State of Washington served (by email) its Response to Defendants Michael D. Lansky, LLC's, dba Avid Telecom, Michael D. Lansky's and Stacey Reeves's Notice of Rule 30(B)(6) Deposition, which notice was served by Defendants on April 22, 2025;
- On June 5, 2025, Plaintiff State of Nevada served (by email) its Response to Defendants Michael D. Lansky, LLC's, dba Avid Telecom, Michael D. Lansky's and Stacey Reeves's Notice of Rule 30(B)(6) Deposition, which notice was served by Defendants on April 22, 2025;
- On July 11, 2025, Plaintiffs served Defendants (by email) with Plaintiffs' Notice of Issuance of Rule 45 Subpoena, which subpoena was issued to Copyright Assured Legal Services, LP dba Dawood & Dawood;
- On July 22, 2025, Plaintiffs served (by email) Volume AGTF_VOL002
 Document Production³ (Bates Nos. between AGTF_000000983 and AGTF_000143507) to Defendants' First Request For Production of Documents;

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- On July 25, 2025, Plaintiffs served (by email and FedEx) Volume AGTF_VOL003 Document Production (Bates Nos. between AGTF_000143509 and AGTF_000143639) to Defendants' First Request For Production of Documents;
- On August 5, 2025, Plaintiffs served (by email) Volume AGTF_VOL004
 Document Production (Bates Nos. between AGTF_000143640 and AGTF_000151612) to Defendants' First Request For Production of Documents;
- On August 5, 2025, Plaintiffs served (by email) Plaintiff States' Written Response to Defendants' July 17, 2025 Objections to (1) Plaintiffs' States' Objections and Answers to Defendants' First Request For Admissions;
 (2) Plaintiff States' Responses and Objections to Defendants' First Request For Production of Documents; and (3) Plaintiffs' responses to Defendants' Rule 30(b)(6) notices; and
- On August 19, 2025, Plaintiffs served Defendants (by email) with Plaintiffs' Notices of Issuance of Rule 45 Subpoenas, which subpoenas were issued to each of the following:
 - USTelecom-The Broadband Association's Industry Traceback Group;
 and
 - CalPrivate Bank.

Case 4:23-cv-00233-CKJ	Document 128	Filed 08/20/25	Page 7 of 17
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1	RESPECTFULLY SUBMITTED this 20th day of August, 2025.	
2		
3 4	FOR THE STATE OF ARIZONA:	FOR THE STATE OF NORTH CAROLINA:
5 6	KRISTIN K. MAYES Attorney General for the State of Arizona	JEFF JACKSON Attorney General for the State of North Carolina
7 8 9 10 11 12	/s/ John Raymond Dillon IV JOHN RAYMOND DILLON IV SARAH PELTON DYLAN JONES LAURA DILWEG ALYSE MEISLIK Assistant Attorneys General Attorneys for the State of Arizona	/s/ Tracy Nayer TRACY NAYER ROCHELLE SPARKO Special Deputy Attorneys General Attorneys for the State of North Carolina
13 14	FOR THE STATE OF INDIANA:	FOR THE STATE OF OHIO:
15 16	TODD ROKITA Attorney General for the State of Indiana	DAVE YOST Attorney General for the State of Ohio
17 18 19 20	/s/ Douglas S. Swetnam DOUGLAS S. SWETNAM THOMAS L. MARTINDALE Deputy Attorneys General Attorneys for the State of Indiana	/s/ Erin Leahy ERIN B. LEAHY Senior Assistant Attorney General Attorney for the State of Ohio
21 22	Lead Counse	el for Plaintiffs
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CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2025, I caused the foregoing NOTICE OF SERVICE OF PLAINTIFFS' FED. R. CIV. P. 5(d)(1)(A) DISCOVERY REQUESTS AND RESPONSES SERVED BETWEEN FEBRUARY 7, 2025, AND AUGUST 19, 2025 to be filed and served electronically via the Court's CM/ECF system upon counsel of record.

/s/ Tracy Nayer

Special Deputy Attorney General Counsel for the Plaintiff State of North Carolina

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